

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION**

<b>In re:</b>	§	<b>Chapter 11</b>
	§	
<b>FIELDWOOD ENERGY III LLC, et al.,</b>	§	<b>Case No. 20-33948 (MI)</b>
	§	
<b>Post-Effective Date Debtors<sup>1</sup></b>	§	<b>(Jointly Administered)</b>

**BP EXPLORATION & PRODUCTION INC.’S WITNESS AND EXHIBIT LIST**

BP Exploration & Production Inc. (“BP”) files this Witness and Exhibit List identifying those individuals that may be called as witnesses and exhibits that may be introduced at the hearing scheduled for **June 7, 2022, at 1:30 p.m.** (prevailing Central Time) (the “Hearing”) on the *Emergency Motion of BP Exploration & Productions, Inc. to Alter or Amend May 24 Order Pursuant to Bankruptcy Rule 9023 [Docket No. 2475]* (the “Emergency Motion”) filed on June 1, 2022.<sup>2</sup>

**A. WITNESSES**

In connection with the Hearing, BP may call any one or more of the following individuals to provide testimony:

1. Craig Duewall, Greenberg Traurig, LLP (fact witness);
2. Nicole S. Bakare, Greenberg Traurig, LLP (fact witness);

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<sup>1</sup> According to the Post-Effective Date Debtors, the Post-Effective Debtors, along with the last four digits of each Post-Effective Date Debtor’s federal tax identification number, are: Fieldwood Energy LLC (6778), Fieldwood Energy Offshore LLC (4994); Fieldwood Energy Inc. (4991); GOM Shelf LLC (8107), FW GOM Pipeline, Inc. (8440). Fieldwood Energy III, LLC, Fieldwood Energy Offshore LLC and Fieldwood Energy Inc. are managed by the Plan Administrator, whose primary mailing address is 16255 Ventura Boulevard, Suite 440, Encino, California 91436, c/o Province, LLC. GOM Shelf LLC and FW GOM Pipeline, Inc., (collectively, the “Post-Effective Date FWE I Subsidiaries”) are managed and operated by Jon Graham, as sole manager of each Post-Effective Date FWE I Subsidiary. The Debtors in the other nine pending chapter 11 cases (which continue to be jointly administered with the cases of the Post-Effective Date Debtors), each of which have either been dissolved or merged into other entities as of the Effective Date, consist of the following: Dynamic Offshore Resources NS, LLC (0158); Fieldwood Onshore LLC (3489); Fieldwood SD Offshore, LLC (8786); Fieldwood Offshore LLC (2930); Bandon Oil and Gas GP, LLC (9172); Bandon Oil and Gas, LP (9266); Fieldwood Energy SP LLC (1971); Galveston Bay Pipeline, LLC (5703); and Galveston Bay Processing LLC (0422).

<sup>2</sup> Capitalized terms used but not defined herein have the meaning ascribed to them in the Emergency Motion.

3. Jared Weir, Greenberg Traurig, LLP (fact witness);
4. Any witness necessary to authenticate a document;
5. Any witness designated or called by any other party; and
6. Any impeachment or rebuttal witness.

**B. EXHIBITS**

In connection with the Hearing, BP may seek to introduce into evidence any one or more of the following documents:

<b>Ex.</b>	<b>Description</b>	<b>Offered</b>	<b>Obj.</b>	<b>Admitted</b>	<b>Disposition</b>
<b>A.</b>	Proposed Order				
<b>B.</b>	BP's Notice of Intention to Arbitrate and supporting exhibits <b>[Filed Under Seal]</b>				
<b>C.</b>	QuarterNorth's Notice of Intention to Arbitrate and supporting exhibits <b>[Filed Under Seal]</b>				
<b>D.</b>	Chart Comparing QuarterNorth's Notice of Intention to Arbitrate with the 2004 Requests <b>[Filed Under Seal]</b>				
<b>E.</b>	Debtors' Notice of Bankruptcy Rule 2004 Requests for Production of Documents from BP Exploration & Production Inc., dated May 14, 2021 [Dkt. No. 1387]				
<b>F.</b>	Debtors' Notice of (I) Entry of Order Confirming Joint Chapter 11 Plan of Fieldwood Energy LLC and Its Affiliated Debtors and (II) Occurrence of Effective Date, dated August 27, 2021 [Dkt. No. 2016]				

<b>Ex.</b>	<b>Description</b>	<b>Offered</b>	<b>Obj.</b>	<b>Admitted</b>	<b>Disposition</b>
<b>G.</b>	August 24, 2021 Hearing Transcript [Dkt. No. 2006]				
<b>H.</b>	September 20, 2021 Email from Nathan Vaughn (QuarterNorth) to Danielle Scott (BP)				
	Any exhibit designated by any other party.				
	Any pleadings, reports, or other documents filed in the Debtors' bankruptcy case.				
	Any impeachment or rebuttal exhibits.				

BP reserves the right to supplement or amend this Witness and Exhibit List at any time prior to the Hearing. BP also reserves the right to rely upon and use as evidence additional documents produced by QuarterNorth or any other party in interest.

Dated: June 3, 2022

Respectfully submitted,

**GREENBERG TRAURIG, LLP**

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***Counsel for BP Exploration & Production Inc.***

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that on June 3, 2022, a true and correct copy of the foregoing Witness and Exhibit List was served by electronic mail via the Court's ECF system to all parties authorized to receive notice in this case.

By: /s/ Karl D. Burrer

Karl D. Burrer